

United States District Court  
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

HERMAN WILSON

**CRIMINAL COMPLAINT**

Case Number:

10-mj-42 FLN

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 8, 2009, in Dakota County, in the State and District of Minnesota, defendant(s)

Herman Wilson did by force, violence, and intimidation take from the person and presence of victim tellers approximately \$21,459 belonging to and in the care, custody, control, and possession of the Building Trades Credit Union located at 5300 South Robert Trail, Inver Grove Heights, Minnesota, an institution the deposits of which were then insured by the National Credit Union Administration.

in violation of Title 18, United States Code, Section(s) 2113(a).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:  
SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

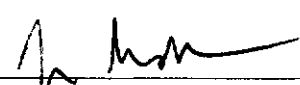
Sworn to before me, and subscribed in my presence,

Date

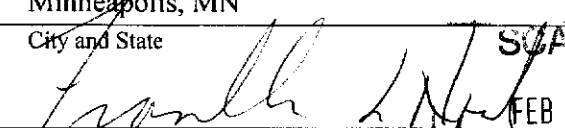
2/4/10  
The Honorable Franklin L. Noel  
UNITED STATES MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

at

  
Signature of Complainant  
Joe Malhoit  
FBI

Minneapolis, MN  
City and State

  
Signature of Judicial Officer

SCANNED

FEB 05 2010

U.S. DISTRICT COURT ST. PAUL

Special Agent Joseph L. Malhoit, III, being first duly sworn, states as follows:

- 1) I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice, and have been so employed since 1997. I am assigned to a squad that investigates violent crime, to include bank robberies, gangs, firearms violations and narcotics violations. I have worked on investigations of various types of criminal activity including bank robberies, gangs, narcotics, and white collar crime, resulting in the arrests and convictions of numerous individuals.
- 2) On 10/08/2009, at approximately 9:30 AM, The Building Trades Credit Union, 5300 South Robert Trail, Suite #100, Inver Grove Hts., Minnesota 55077, was robbed. The loss from this Credit Union robbery was \$21,459.00. At the time of this robbery, The Building Trades Credit Union was insured by the National Credit Union Administration (NCUA.) Their NCUA number is 24414. During this robbery, the robber walked in and orally demanded money from the tellers while he was brandishing a black semiautomatic handgun. He demanded the "hundreds" and told them, "No ink or I will fucking kill you." Your affiant believes that "ink" is a reference to exploding dye packs. The victim tellers described the robber as a black male, 6' to 6'2" tall, around 200 pounds wearing a neon construction vest, surgical mask, goggles, dark colored hooded sweatshirt, gloves and a dark colored hat. He carried a kitty litter bucket into the bank which contained a black bag and a handgun.
- 3) On the morning of the robbery law enforcement responded and located a surgical mask, hat and tape measure outside of the Credit Union, along the path which the robber used to flee. These items were taken as evidence.
- 4) The staff of the bank noted that they believed that the person who robbed them cased their Credit Union on the previous Monday. The individual who cased their bank had a scar on his face between his lip and nose and he was driving a green Lincoln Town Car with a rusty trailer hitch.
- 5) After this robbery, the Shoreview branch of The Building Trades Credit Union had an individual who matched the above noted robber's description case their Credit Union. This occurred on 11/23/09. This individual had a scar on his face and was driving a green Lincoln Town Car with a Landau top on it.
- 6) The Ramsey County Sheriff's Office conducted a search of offenders' photographs with scars on them. They identified Herman Wilson as a potential subject. When law enforcement attempted to locate Herman Wilson on 12/1/09 they went to an address he gave as an emergency contact when he was previously jailed. Parked at this location was a green Lincoln Town Car with a Landau top and rusty trailer hitch. Eventually, a male who matched Herman Wilson's description got into this vehicle and drove away. Meanwhile, law enforcement set up surveillance at Herman Wilson's listed home address, 6417 Boone Ave, Brooklyn Park, Minnesota. While this address was being watched, a green Lincoln Town Car pulled into the garage.
- 7) The Inver Grove Heights Police Department conducted a photo line-up at the Credit Union that had been robbed on 10/8/09 and one of two employees was able to identify Herman Wilson as

the person who cased the bank three days prior to the robbery.

8) On 12/02/2009, a search warrant was executed at 6417 Boone Ave. Brooklyn Park, MN, Wilson's residence. Wilson was arrested as he attempted to flee off the deck of this home before the search warrant was executed. Located during this search, by the Inver Grove Heights Police Department, were a leather jacket and leather beret, which matched the clothing worn when the Inver Grove Heights Credit Union was cased. In addition, goggles matching the ones worn by the robber on 10/8/09 were seized, as well as a duffle bag, boots and the Lincoln town car.

9) The mask which was recovered outside the Credit Union was sent to the Bureau of Criminal Apprehension (BCA) lab and the DNA from this mask was compared with Herman Wilson's DNA (a known sample taken by the Inver Grove Height Police Department). On 01/30/2010 it was discovered to be a match.

Further your affiant sayeth not.

Sworn to before me, and subscribed in my presence,

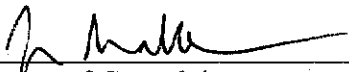
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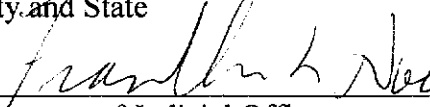
Date

The Honorable Franklin L. Noel

UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

  
Signature of Complainant  
Joe Malhoit  
FBI

Minneapolis, MN  
City and State  
  
Signature of Judicial Officer